

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**MOTION TO CONTINUE PLEA HEARING**

The defendant in this matter respectfully requests, through counsel, that the Rule 11 hearing currently scheduled for April 9, 2010 be continued to any of the following dates in the afternoon if possible: May 4, 6, 12, 13 of 2010. As reason therefore, defense counsel states that Magistrate Judge Hillman has ordered that this case stay within his session through at least April 9, 2010 for the purpose of resolving a discovery issue raised by the defendant.

Defense counsel has notified Assistant United States Attorney David Hennessy of this request. The defendant agrees to the exclusion of time for speedy trial purposes from April 9, 2010 through the next date set by this Court for a plea hearing.

JAMES FORD  
By his attorney,

/s/ Oscar Cruz, Jr.  
Oscar Cruz, Jr.  
B.B.O. #630813  
Federal Defender Office  
51 Sleeper Street, 5<sup>th</sup> Floor  
Boston, MA 02210  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Oscar Cruz, Jr., hereby certify that this document filed through the ECF system will be sent electronically to the registered participant, David Hennessy, as identified on the Notice of Electronic Filing (NEF) on March 29, 2010.

/s/ Oscar Cruz, Jr.  
Oscar Cruz, Jr.